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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 DAVID A. GARCIA CABALLERO, an  
11 individual,

12 vs. Plaintiff,  
13

14 STATE FARM MUTUAL AUTOMOBILE  
15 INSURANCE COMPANY, a foreign  
corporation; DOES I through X; and ROE  
16 CORPORATIONS I through X, inclusive,

17 Defendants.

Case No.: 2:24-cv-00268-RFB-NJK

18 **STIPULATION AND ORDER TO  
19 EXTEND DISCOVERY DEADLINES  
20 (FIRST REQUEST)**

21 Plaintiff DAVID A. GARCIA CABALLERO (“Plaintiff”), by and through his attorneys  
22 of record, FARHAN R. NAQVI and PAUL G. ALBRIGHT of the law firm NAQVI INJURY  
23 LAW, and Defendant STATE FARM AUTOMOBILE INSURANCE COMPANY  
24 (“Defendant”), by and through its attorney of record, RENEE M. FINCH of the law firm  
MESSNER REEVES, LLP, submit this **STIPULATION AND ORDER TO EXTEND**  
25 **DISCOVERY DEADLINES (FIRST REQUEST)** for the Court’s consideration pursuant to LR  
26 IA 6-1 and this Honorable Court’s Order dated June 3, 2024.<sup>1</sup>

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<sup>1</sup> Order, on file herein as Doc. No. 15.

I.

**DISCOVERY COMPLETED TO DATE – LR 26-3(a)**

1. A Rule 26(f) Case Conference was held and a Discovery Plan/Scheduling Order was filed.
  2. Plaintiff has made initial disclosures.
  3. Defendant has made initial disclosures.
  4. An Order to Stay Proceedings was entered on May 9, 2024.<sup>2</sup>
  5. An Order granting PRINCE LAW GROUP's Motion to Withdraw and lifting the stay was entered on June 3, 2024.<sup>3</sup>
  6. The parties reconvened on June 6, 2024 to discuss reasonable dates moving forward, given the circumstances.

II.

**DISCOVERY TO BE COMPLETED – LR 26-3(b)**

1. Depositions of various witnesses including, but not necessarily limited to, the parties, treating physicians, experts, employees, and percipient witnesses.
  2. Expert disclosures.
  3. Production of additional records related to Plaintiff's medical treatment, as well as documents within Defendant's possession.
  4. Written discovery.
  5. Subpoenas.
  6. Other discovery as needed.

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<sup>2</sup> Order Granting Stipulation and Order to Stay Proceedings, on file herein as Doc. No. 11.

<sup>3</sup> Order, on file herein as Doc. No. 15.



II.

**WHY DISCOVERY CANNOT BE COMPLETED IN THE TIME PROVIDED BY THE SCHEDULING ORDER – LR 26-3(c)**

Good cause exists in this case to grant a discovery extension. Of most significance, the tragic passing of Plaintiff's lead counsel resulted in a stay of the proceedings.<sup>4</sup> Thereafter, PRINCE LAW GROUP filed a Motion to Withdraw as Counsel of Record for Plaintiff, requiring co-counsel at NAQVI INJURY LAW to substitute in as lead counsel.<sup>5</sup> This Honorable Court lifted said stay on June 3, 2024, and ordered the parties to "file a stipulation with new case management deadlines by June 10, 2024."<sup>6</sup> Now that the stay has been lifted, the parties will need additional time to properly conduct the outstanding discovery that they were not able to complete during the stay of proceedings. Further, counsel for the Plaintiff has received several new cases transferred from the Prince Law Group and will require time to adequately review them and formulate discovery plans moving forward. As such, the parties request that the current discovery deadlines be extended as outlined below. This is the **FIRST REQUEST** for an extension of discovery in this matter.

III.

**PROPOSED SCHEDULE FOR COMPLETING DISCOVERY – LR 26-3(d)**

DISCOVERY	Current Deadline	PROPOSED DEADLINE
Amending Pleadings/Adding Parties	August 13, 2024	November 11, 2024
Expert Witness Disclosure	September 12, 2024	December 11, 2024
Rebuttal Expert Disclosure	October 11, 2024	January 10, 2025
Discovery Deadline	November 11, 2024	February 10, 2025
Dispositive Motions	December 11, 2024	March 12, 2025
Pretrial Order	January 10, 2025 <sup>7</sup>	April 11, 2025

<sup>4</sup> Order Granting Stipulation and Order to Stay Proceedings, on file herein as Doc. No. 11.

<sup>5</sup> Prince Law Group's Motion to Temporarily Lift Stay and Withdraw as Counsel of Record for Plaintiff, on file herein as Doc. No. 13.

<sup>6</sup> Order, on file herein as Doc. No. 15.

<sup>7</sup> In the event that dispositive motions are filed, the date for filing the joint pretrial order will be suspended until thirty (30) days after decision of the dispositive motions or further order of the Court.



If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extended deadline. The parties represent that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

**IT IS SO STIPULATED** and agreed as to the terms and conditions of this Stipulation to

Extend Discovery Deadlines.

DATED this 10th of June, 2024.

DATED this 10th of June, 2024.

NAQVI INJURY LAW

MESSNER REEVES, LLP

/s/ Paul G. Albright

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IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: June 11, 2024